

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2021-153-S**

IN RE:

Application of Palmetto Wastewater  
Reclamation, Inc. for Adjustment of Rates  
and Charges (Increase) and Terms and  
Conditions of Sewer Service

**SOUTH CAROLINA DEPARTMENT  
OF CONSUMER AFFAIRS FIRST SET  
OF INTERROGATORIES AND  
REQUESTS FOR PRODUCTION TO  
PALMETTO WASTEWATER  
RECLAMATION, INC.**

Pursuant to S.C. Code Ann. Regs. 103-833, the South Carolina Department of Consumer Affairs (the "Department"), by and through its undersigned counsel, hereby submits this First Set of Interrogatories and Requests for Production to Palmetto Wastewater Reclamation, Inc. ("PWR" or "Company"). Pursuant to South Carolina Rule of Civil Procedure 26(e), and Commission regulations, each request is continuing until the time of the hearing such that the Company must promptly transmit to the Department the requested information as it becomes available.

**INSTRUCTIONS**

1. Responses to these requests should be provided to the undersigned, via email, within twenty (20) days of the date of service.
2. All information should be provided to the undersigned in the format requested and under oath.
3. All responses to the below requests should be labeled using the same numbers as used herein.
4. If the requested information is found in other places or in other exhibits, reference shall not be made to those, but instead, the information should be reproduced and placed in the responses to this request in the appropriate sequence.
5. All documents shall be provided in their native format, e.g., in Word, Excel, or PowerPoint format with all functions, data, and formulas intact.
6. Each request should be reproduced at the beginning of the response thereto.
7. If the response to any Request for Production of Documents is that the information requested is not currently available, please state when the information requested will become available.
8. This request shall be deemed continuing so as to require PWR to supplement or amend its responses as any additional information becomes available up to and through the date of hearing.

9. For any document withheld under a claim of privilege, submit a sworn or certified statement from your counsel or one of your employees in which you identify the document by author, addressee, date, number of pages, and subject matter; specify the nature and basis of the claimed privilege and the paragraph of this demand for documents to which the document is responsive; and identify each person to whom the document or its contents, or any part thereof, has been disclosed.

10. If a refusal to respond to a Request for Production of Documents is based on the grounds that same would be unduly burdensome, identify the number and nature of documents needed to be searched, the location of the documents, and the number of hours and costs required to conduct the search.

11. Answer each request on the basis of the entire knowledge of PWR, including information in the possession of PWR or its consultants, representatives, agents, experts, operating divisions, business divisions, assigns, partners, and attorneys, if any.

12. If any request cannot be answered in full, respond to the extent possible and specify the reasons for PWR's inability to respond.

### **DEFINITIONS**

As used herein, the following terms shall have the meaning and be interpreted as set forth below:

1. "You," "your," and "Company" mean PWR or any of its affiliates, officers, directors, employees, attorneys, or agents.

2. "Application" is defined as the application filed by Palmetto Wastewater Reclamation, Inc. on June 16, 2021 or as otherwise revised.

3. "Company" and "PWR" are defined as Palmetto Wastewater Reclamation, Inc., its parent(s), subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, and other persons acting in its behalf.

4. "Workpapers" and "documents" are defined in the broadest terms and should not be construed as limited to the listed examples, or limited only to items that are currently within your control or custody; include each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of writing. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, computer files, billings, evaluations, photographs, audio tapes, and videotapes. The terms include drafts, revisions or amendments of any of the above, and generally, any kind of tangible, permanent records that are now, or formerly were, in your possession, custody or control, or that were known by you to exist, and that can be located or discovered by reasonably diligent efforts.

5. "Communication(s)" when used in these Requests shall include the transmittal of information by any means, written, oral, electronic or otherwise.

6. When used in referenced to a document, "identify," identity," and "identification" mean to state the type of document (e.g., computer-stored information, microfilm, letter, memorandum, policy circular, minute book, telegram, chart, etc.), or some other means of identifying it, and its present location and custodian. If any such document was, but no long is, in your possession or subject to your control, state what disposition was made of the document, and if the document was destroyed or disposed of pursuant to a retention policy, please state the retention policy.

### **DOCUMENT AND INFORMATION REQUESTS**

- 1-1 Please provide a copy of all questions, discovery, or information requests submitted to the Company by other parties, including the Office of Regulatory Staff (“ORS”), and provide the Company’s responses, including responsive documents or materials, to such requests.
- 1-2 Provide all workpapers and source documents that support or form the basis for the Company’s Application, testimony, and exhibits. Please provide the requested documents in electronic form with any applicable spreadsheet links and formulas intact. Include the source data and explain all assumptions and calculations used. To the extent the data requested is not available in the form requested, provide the information in the form that most closely matches what has been requested.
- 1-3 Please provide all reports or other documents, including work papers, used in the development and preparation of the testimony of any witness retained by or on behalf of the Company in this case.
- 1-4 Please provide the curriculum vitae or resume showing all qualifications, employment history, previous witness experience, and publications of all witnesses whom the Company intends to use as a witness at the hearing in this case.
- 1-5 Please provide the names and addresses of any person whom the Company intends to use as a witness at the hearing in this case and identify with specificity the issues to be addressed by such witnesses and indicate whether or not written or recorded statements have been taken from the witnesses and who has possession of such statements.
- 1-6 For each person known to be a witness concerning the facts of the case or the Application, set forth either a summary sufficient to inform the other party of the important facts known to or observed by such witness, or provide a copy of any written or recorded statements taken from such witnesses.
- 1-7 Please reference Exhibit A to the Application, which states:

“Bills issued for monthly sewer service provided during the thirty-six (36) month period beginning May 14, 2019 shall be reduced thirty-four (\$0.34) cents per single family equivalent for commercial customers. Bills issued for service provided from and after that thirty-six (36) month period will be at the full rates shown above unless a different rate is approved by the Public Service Commission after the effective date of this rate schedule.”

Please explain why the referenced reduction only applies to commercial customers and no other classes.

1-8 Please reference Exhibit A to the Application, which states:

“The Utility may, at its discretion, for the convenience of the owner, bill a tenant in a multiunit building consisting of four or more residential units which is served by a master sewer meter or a single sewer connection. However, in such cases all arrearages must be satisfied before service will be provided to a new tenant or before interrupted service will be restored.”

Does the Company interpret this section to mean that if the Company is billing individual tenants in a multi-unit building and one tenant is in arrears, then new service would not be provided to another new tenant or service would not be restored for another tenant? Please explain.

1-9 Please reference Exhibit A to the Application, which states:

“The liability of the Utility, its officers, employees, and agents for damages arising out of the interruption of service or failure to furnish service, whether caused by acts or omissions, shall be limited to those remedies provided in the Commission's rules and regulations governing wastewater utilities.”

Please explain, in the Company's opinion, what customer remedies are provided in the Commission's rules and regulations for damages arising out of the interruption of service or failure to furnish service.

1-10 The Application indicates a “Miscellaneous Expenses” proforma adjustment of \$955,039. Please explain this adjustment and provide all supporting documentation for the adjustment.

S.C. DEPARTMENT OF CONSUMER AFFAIRS



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July 15, 2021  
 Columbia, South Carolina

**CERTIFICATE OF SERVICE**

I, Roger Hall, hereby certify that the foregoing document was served by electronic mail on all parties at the addresses listed in the Commission's official service list for Docket 2021-153-S on July 15, 2021

A handwritten signature in blue ink, appearing to read "Roger Hall", is positioned above a horizontal line.

Roger Hall, Esq.